

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NBA PROPERTIES, INC.,

Plaintiff,

v.

DONGGUAN ALLEN HOUSE OF JEWELRY  
& FINDINGS CO., LTD., et al.,

Defendants.

Case No. 22-cv-07107

**Judge Joan B. Gottschall**

**Magistrate Judge Sheila M. Finnegan**

**PLAINTIFF’S AMENDED AGREED MOTION FOR ENTRY OF A CONSENT  
JUDGMENT AS TO CERTAIN DEFENDANTS**

Plaintiff NBA Properties, Inc. (“NBAP” or “Plaintiff”) filed an Amended Complaint [34] against, among others, Defendant Nos. 4, 47, 112, 113, 121, 126, 139, 140, 151, 155, 160, 163, 178, 180, 189, 194, 196, 199, 201, 203, 204, 214, 222, 228, 230, 233, 238, and 275 (“Defendants”) (collectively, the “Parties”) on January 9, 2023.

On April 21, 2023, Plaintiff filed a Motion to Approve Consent Judgment [53] and submitted a copy of the proposed Consent Judgment. The substantive content of Plaintiff’s filed Motion to Approve Consent Judgment [53] has not changed. This Amended Motion just reflects the addition of Defendant Nos. 113, 178, and 228, to the proposed Consent Judgment pursuant to agreements reached by the parties. Defendant Nos. 113, 178, and 228 were previously included in Plaintiff’s Motion for Entry of Default and Default Judgment [55].

Plaintiff and Defendants, including Defendant Nos. 113, 178, and 228, have resolved all claims arising from the allegations in the Amended Complaint, and have agreed to entry of the proposed Consent Judgment. As such, the Parties move this Honorable Court for the entry of a

Consent Judgment as to Defendant Nos. 4, 47, 112, 113, 121, 126, 139, 140, 151, 155, 160, 163, 178, 180, 189, 194, 196, 199, 201, 203, 204, 214, 222, 228, 230, 233, 238, and 275.

A memorandum in support was previously filed as docket entry 54. A copy of the amended proposed Consent Judgment has been submitted to Proposed\_Order\_Gottschall@ilnd.uscourts.gov.

Dated this 4<sup>th</sup> day of May 2023.

Respectfully submitted,

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*Attorneys for Plaintiff NBA Properties, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of May 2023, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website to which the Domain Names that have been transferred to Plaintiff's control now redirect, and I will send an e-mail to the e-mail addresses identified in Exhibit A hereto that includes a link to said website.

/s/ Allyson M. Martin  
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